

DECLARATION OF MATTHEW SUMNER

I, Matthew Sumner, being of lawful age and under the penalty of perjury pursuant to 12 O.S. § 426, do declare as follows:

1. I am employed as a detention officer at the Logan County Detention Center and have been since January 16, 2018.

2. I am a named Defendant in *Stewart v. Turn Key Health, et al.*, Case No. CIV-20-957-D (W.D. Okl.) and am familiar with the allegations alleged by Charles Stewart.

3. I am a detention officer shift supervisor for the Logan County Detention Center with the rank of Lieutenant. I was promoted to Lieutenant on August 1, 2019

4. I am familiar with former Logan County Justice Center inmate Charles Stewart, as a result of my position as a detention officer and Mr. Stewart's incarceration in the Logan County Detention Center. I did not know Mr. Stewart outside the Logan County Detention Center.

5. On August 10, 2020, I responded in writing to Mr. Stewart's Request to Staff dated August 6, 2020 and concerning COVID-19 by stating that LCDC inmates had been provided with cleaning supplies and LCDC staff were doing all they could to prevent COVID-19 from spreading into the facility pursuant the guidelines of the CDC.

6. On August 24, 2020, I responded to Mr. Stewart's August 9, 2020, Request to Staff, regarding his dental issue by stating that Mr. Stewart had been provided cleaning supplies for his cell and that the LCDC was following CDC guidelines for the screening of inmates.

7. When I responded on August 24, 2020 to Mr. Stewart's August 9, 2020, Request to Staff I mistakenly believed the request to be regarding COVID-19 due to its

similarity to Mr. Stewart's August 6, 2020, Request to Staff regarding COVID-19 and my response reflects this belief.

8. On September 8, 2020, I responded in writing to Mr. Stewart's Offender Grievance dated September 3, 2020 regarding his dental issue by inquiring as to when Mr. Stewart's Provider appointment for his dental issue had been and the number of Sick Call Requests he had submitted to Turn Key staff regarding this issue.

9. In responding to Mr. Stewart's Offender Grievance with these inquiries I was attempting to investigate and verify the underlying factual basis for his for his grievance pursuant to LCDC Policy No. 2-06, Inmate Grievances.

10. Prior to responding to Mr. Stewart's Offender Grievance Report Form dated September 3, 2019, I consulted with Turn Key Medical Staff, who informed me that Mr. Stewart's dental issue had been treated and any treatment beyond what had already been provided was not medically necessary and would be elective in nature. My request to Mr. Stewart was for information from verifying that information and for all additional information Mr. Stewart might have to support his claims.

11. Following my response to Mr. Stewart's Offender Grievance on September 8, 2020, I never received a response from Mr. Stewart in any way regarding the specific grievance request including any information regarding the timing of Mr. Stewart's Sick Call request nor the number of Sick Call requests he had submitted.

12. On January 6, 2021, I became a reserve officer with Logan Sheriff's Office due to health issues.

13. Further, Staff at LCDC has no oversight or control over whether care is deemed medically necessary or what care an inmate receives.


14. I am not aware of any Turn Key Health employee at the Logan County Detention Center having ever refused to treat an inmate when it was medically necessary, having provided inadequate or inappropriate care to an inmate, and/or of any Turn Key Health, LLC policy which authorizes the non-treatment, inadequate treatment, and/or inappropriate medical treatment of any inmate at the Logan County Detention Center.

15. At no time have I interfered with, or requested or directed staff to interfere with any medical assessment or treatment of Mr. Stewart. Nor am I aware of any staff interfering with any medical assessment or treatment of Mr. Stewart.

16. The facts, statements and assertions set forth above are based on my own personal knowledge and/or review of relevant materials and documents.

17. The facts, statements and assertions set forth above are true and correct to the best of my knowledge, information and belief.

Dated this 11 day of June, 2021.


Matthew Sumner

Declaration of M. Sumner
Case No. CIV-20-957-D (W.D. Okl.)